

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(PITTSBURGH)**

IN RE:

Major R. Rainey

Debtor(s).

CHAPTER 13

CASE NO.: 25-20872-GLT

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2021-D, Mortgage-Backed Securities, Series 2021-D (“U.S. Bank”), secured creditor to the above entitled Debtor(s) by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Elizabeth K. Holdren, Esq.
Hill Wallack LLP
21 Roszel Road
P.O. Box 5226
Princeton, NJ 08543
Phone: 609-924-0808
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PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive U.S. Bank's (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which U.S. Bank is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: May 7, 2025

Hill Wallack LLP

By: /s/ Elizabeth K. Holdren
Elizabeth K. Holdren, Esq.
Hill Wallack LLP
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Princeton, NJ 08543
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Counsel to NewRez LLC dba Shellpoint
Mortgage Servicing as servicer for U.S.
Bank National Association, as Indenture
Trustee on behalf of and with respect to
Ajax Mortgage Loan Trust 2021-D,
Mortgage-Backed Securities, Series 2021-D

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CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance for NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2021-D, Mortgage-Backed Securities, Series 2021-D in the manner indicated below on May 7, 2025:

Major R. Rainey
419 Grove Street, Apt. 3
Pittsburgh, PA 15219
DEBTOR - VIA REGULAR MAIL

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COUNSEL FOR DEBTOR -VIA ECF

Office of the United States Trustee
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UNITED STATES TRUSTEE - VIA ECF

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TRUSTEE - VIA ECF

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